From:	Alma Ramos
To:	IAPMOSD-2027wetc@ConnectedCommunity.org
Cc:	codes-dept
Subject:	2025 WESTAND ROP Second Circulation of Negative Comments
Date:	Wednesday, August 13, 2025 1:38:14 PM
Attachments:	image004.png 2025 WEStand ROP Second Circulation of Comments.pdf
Importance:	High

Dear WESTAND Technical Committee Members,

In accordance with Section 5.6 of the Regulations Governing Consensus Development of the Water Efficiency and Sanitation Standard, I have attached the additional negative comments received after the recirculation period to allow the committee the opportunity to review the comments.

The ballot material for the subject documentation is now available on the KAVI site at: https://kavi.iapmo.org/higherlogic/ws/groups/28fd25e1-9e1f-493a-92c9-018ed33e7cfc/ballots

The additional negatives received are for Items #003, 004, 008, 018, 027, 038, 082, 084, 085, 093 and 104. Therefore, these items will be reopened to allow the committee the opportunity to review the comments.

If you do not wish to change your vote, no action is required. However, if you wish to change your vote after review of comments, you may do so by **Tuesday, August 19, 2025, at 5:00 PM (PT)**. Any affirmative voters can change their vote.

If you wish to change your vote [negative] or indicate [abstain] please provide your comments by replying to this email or submitting on Kavi.

Thank you for your willingness to serve on this committee.

Alma Ramos
Sr. Manager of Codes and Standards
IAPMO World Headquarters
4755 E. Philadelphia Street
Ontario, CA 91761
Office (909) 230-5528
Email: alma.ramos@iapmo.org

2025 WEStand ROP Second Circulation of Comments

Ballot Name:	WEStand Item #003	
Voter Name	**Vote**	**Comments**
Lando, Pat	NEGATIVE w/comment	I prefer not to use the term "blackwater."

Ballot Name:	WEStand Item #004	
Voter Name	**Vote**	**Comments**
Klein, Gary	NEGATIVE w/comment	The definition is not needed.
Lando, Pat	NEGATIVE w/comment	The definition is not needed.
Nickelson, David	NEGATIVE w/comment	This definition is not needed as it is a common term.
Premer, Damon	NEGATIVE w/comment	This definition is not needed.
Smith, Billy	NEGATIVE w/comment	A definition is not needed because the term is self-explanatory.

Ballot Name:	WEStand Item #008	
Voter Name	**Vote**	**Comments**
Kehoe, Paula	NEGATIVE w/comment	I need additional information. The comments indicate that more information is needed.
Klein, Gary	NEGATIVE w/comment	John Koeller makes some excellent points.
Koeller, John	NEGATIVE w/comment	After reading the committee statement, I concluded that a full and complete discussion did not occur at the committee meeting. With respect to that statement, concerns about "potential conflicts with the plumbing code" are meaningless without identifying those conflicts. After all, WEStand is a stretch code (or standard) for water efficiency. As such, throughout WEStand and the proposals being considered for the next version, there are many supposed conflicts. To not consider this significant change to WEStand based upon the cited reasoning in the committee statement is to avoid trends already in place and thereby defer consideration for another 2 or 3 years. Second, comments citing PERC as it relates to drain line carry are irrelevant. The PERC studies were not directed at residential dwellings as covered in this proposal. In fact, PERC was focused entirely upon commercial applications where little supplemental water was available (as in residential dwellings), drainline lengths are longer, drainline slopes are specified differently, and water closet usage can sometimes be considered more aggressive. That is, abusive use and the flushing of products other than human waste and toilet paper. Instead of PERC, the dominant study for residential drainlines in reduced flow environments is the 20-year-old study conducted on behalf of the Canada Mortgage and Housing Corporation. That study's purpose was to examine the feasibility of 0.8 gpf (3.0 L) water closets in single-family residential applications. It showed that, with the shorter drainline distances to the sewer, 0.8 gpf was sufficient to transport the waste without any supplemental water as normally provided in the home by showers and clothes washers. Plus, of course, water closets in the home do not generally suffer from the abuse mentioned above. As a direct result of the 2005 study findings, hundreds of thousands of 0.8 gpf water closets have been successfully installed and are operating in the U.S. and Canada. Note that the current proposal on the table for WEStand is not for 0.8 gpf water closets, but rather 1.1 gpf water closets in residential only. 1.0 and 1.1 gpf water closets first entered the U.S. market in 2000 and 2001, so the products are mature and manufactured by over 3 dozen companies. Our organization, Maximum Performance (MaP) Testing, currently lists 454

		different models of water closets that comply with the 1.1 gpf limitation, all of which are certified to the U.S. EPA WaterSense specification as well. (https://map-testing.com/wp-content/uploads/2025/05/2025-05-02-ALL_MaP_PREMIUM-HETs.pdf) These water closet models are being rebated by water utilities in California, Seattle, Denver, Atlanta, and elsewhere and installed in aging and new homes in those areas. In Southern California alone, for example, over 400,000 such 1.1 gpf (or less) water closets were installed in homes by 2023. Finally, as additional background, the California Energy Commission (CEC) is in the process of evaluating and adopting new regulations for water closets, including a mandate that the sale and installation of all new water closets in the state be limited to 1.1 gpf models. That proposal was for models installed in both residential and commercial installations. Advocacy groups (including MaP) have been engaged in attempting to change that thinking to residential only, given that water closets in commercial and industrial applications are quite different in their demands upon the plumbing system. We hope the CEC will agree and focus their attention instead upon residential, working in conjunction with the code-writing bodies. **SUMMARY:** (1) The PERC study is not applicable to this proposal; instead, the CMHC study addresses residential drainlines. (2) Water closets functioning at 1.1 gpf or less have existed in the marketplace and in homes for 25 years; to my knowledge, customers/users/homeowners are overwhelmingly satisfied with them. (3) Millions of 0.8 gpf, 1.0 gpf, and 1.1 gpf models have been installed as replacements in older homes in the U.S. and Canada, especially in California. (4) Water closets in residential and commercial installations experience vastly different demands by users; to classify them as performing in identical environments is wrong. (5) In our current MaP list of 1.1 gpf (or less) water closets, there are 454 product models not only certified to the WaterSense specification; all meet more aggressive performance requirements than the current ASME/CSA product standard requires. 1.1 gpf water closets in residential applications are a natural evolution in product development and should be recognized in a stretch code and standard such as WEStand. I urge members to reconsider their vote to “reject” and avail themselves of all the technical and other information at hand before finalizing their vote.
Kuchta, Todd	NEGATIVE w/comment	Although 1.1 gpf water closets are more common, issues with adequate carry in the pipes have been observed. It is recommended not to lower the current flow rate.
Lando, Pat	NEGATIVE w/comment	John Koeller does a great job supporting a negative vote.
Lenger, Markus	NEGATIVE w/comment	I agree with Ed Osann and John Koeller.

Ballot Name:	**WEStand Item #018**	
Voter Name	**Vote**	**Comments**
Klein, Gary	AFFIRMATIVE	There is no flow rate that makes a dipper well water-efficient, and there is certainly no need to increase it.
Lenger, Markus	AFFIRMATIVE	I agree with Ed Osann and Gary Klein’s comments. It is wasting water.

Kehoe, Paula	NEGATIVE w/comment	I do not think we have enough information to proceed.
Nickelson, David	NEGATIVE w/comment	The proponent's substantiation clearly shows that the current maximum flow rate of 0.2 gpm may not be sufficient to meet FDA requirements for removing particulates. The proposed 2.2 gpm limit is not a mandatory flow, but rather a maximum. If particulates can be removed at a lower flow rate, then a lower rate may be used. The current language does not permit a higher flow rate when particulates are not being removed. The language in the proposal provides the opportunity to properly rinse utensils, whereas the current language is very limiting and does not consider the effectiveness of the well.
Premer, Damon	NEGATIVE w/comment	I agree with Kyle Thompson's comments.

Ballot Name:	**WEStand Item #027**	
Voter Name	**Vote**	**Comments**
Braband, Steven	AFFIRMATIVE	For emergencies, all available pressure should be used.
Koeller, John	AFFIRMATIVE	This small clarification is a needed step forward, but overall, this provision has a long way to go before it actually addresses systems intended to detect leaks. In fact, most of the "leak detection" systems in the marketplace today (there are dozens) do not detect "leaks" but rather detect water and do not actually determine whether small (or large) water flows are actually "leaks." Furthermore, the IAPMO standard currently being cited is entirely inadequate for the type of equipment and devices being marketed today.
Kehoe, Paula	NEGATIVE w/comment	This needs additional clarity.
Klein, Gary	NEGATIVE w/comment	The intent of the changes to this section remains unclear.
Lando, Pat	NEGATIVE w/comment	It is unclear what is being detected, "leak" should remain.
Lenger, Markus	NEGATIVE w/comment	This needs clarity.
Nickelson, David	NEGATIVE w/comment	I agree with other comments. The term "leak" should remain.
Potts, Beverly	NEGATIVE w/comment	The word "leak" should remain so that the intent is clear.
Premer, Damon	NEGATIVE w/comment	This needs clarity.
Smith, Billy	NEGATIVE w/comment	It is unclear what is being detected. The term "leak" should remain.

Ballot Name:	**WEStand Item #038**	
Voter Name	**Vote**	**Comments**
Kendzel, Jim	NEGATIVE w/comment	I agree with Chuck White's position.
Klein, Gary	NEGATIVE w/comment	The wording in this proposal needs clarification. I recommend removing the words "circular sanitation" and instead convey the underlying intent.
Mann, David	NEGATIVE w/comment	I am in complete agreement with Chuck White.
Potts, Beverly	NEGATIVE w/comment	I agree with Chuck White's comments. Also, more clarification is needed on these systems.
Premer, Damon	NEGATIVE w/comment	I agree with David Mann.
Smith, Billy	NEGATIVE w/comment	I agree with Charles White.

Ballot Name:	**WEStand Item #082**	
Voter Name	**Vote**	**Comments**
Lando, Pat	NEGATIVE w/comment	We need to remove the term "blackwater." Let's find a way to do this. I am open to suggestions.

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Ballot Name:	WEStand Item #084	
Voter Name	**Vote**	**Comments**
Lando, Pat	NEGATIVE w/comment	We need to remove the term "blackwater." Let's find a way to do this. I am open to suggestions.

Ballot Name:	WEStand Item #085	
Voter Name	**Vote**	**Comments**
Klein, Gary	AFFIRMATIVE	I support the proposed revision; however, it needs further work, along the lines of what Ed Osann and Kent Sovocool have shared, to ensure the language is clear.
Braband, Steven	NEGATIVE w/comment	Onsite sewage systems should comply with NSF 245. Other graywater and nonpotable systems should comply with NSF 350.
Kehoe, Paula	NEGATIVE w/comment	I agree with Ed Osann's comments.
Kendzel, Jim	NEGATIVE w/comment	I agree with Ed Osann's comments. The UPC uses the term "alternative engineered design;" so at a minimum, we should use the same terminology as the UPC. Unfortunately, the term is not defined in the UPC. In addition. the entire section needs work. As written, it implies that engineered system components do not need to be listed or comply with any standards. It is understood that what I refer to as "custom built" systems for a site specific application, which is what I believe is the intent of engineered systems in this section, are difficult, if not impossible, to list. However, components of the systems should be held to some type of product standard covering material safety and structural integrity and where appropriate, performance.
Koeller, John	NEGATIVE w/comment	I agree with Ed Osann's comments.
Premer, Damon	NEGATIVE w/comment	I am in agreement with Ed Osann.

Ballot Name:	WEStand Item #093	
Voter Name	**Vote**	**Comments**
Kehoe, Paula	AFFIRMATIVE	I agree with Ed Osann’s comments.
Kendzel, Jim	AFFIRMATIVE	Although I agree with Ed Osann's comments, I believe the TC’s rejection can be addressed through public comment. The committee’s role is to avoid wordsmithing while providing the proponent with sufficient direction in the rationale for rejection so they can consider submitting a revised proposal.
Klein, Gary	AFFIRMATIVE	I agree with Ed Osann’s comments about how to improve the wording.
Koeller, John	NEGATIVE w/comment	I agree with Ed Osann’s comments.

Ballot Name:	WEStand Item #104	
Voter Name	**Vote**	**Comments**
Kehoe, Paula	NEGATIVE w/comment	I agree with Laura Allen's comments.
Kendzel, Jim	NEGATIVE w/comment	I agree with Laura Allen's comments.
Klein, Gary	NEGATIVE w/comment	Laura Allen makes some excellent points.
Koeller, John	NEGATIVE w/comment	I agree with Laura Allen's comments.
Lando, Pat	NEGATIVE w/comment	I agree with Laura Allen's comments.
Lenger, Markus	NEGATIVE w/comment	I agree with Laura Allen.
Premer, Damon	NEGATIVE w/comment	I agree with Laura Allen.
Sovocool, Kent	NEGATIVE w/comment	I feel Laura Allen advances excellent points, and the impact on utility conservation programs cannot be ignored.